AMERICAN TRUCKING ASSOCIATIONS
950 N. Glebe Road ★ Suite 210 ★ Arlington, VA ★ 22203-4181
www.trucking.org

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF ENGINEERING AND TECHNOLOGY AND WIRELESS TELECOMMUNICATIONS BUREAU
GN DOCKET NO. 18-357

Notice of Request for Comments:
5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-to-Everything (C-V2X) Technology in the 5.9 GHz Band

SUBMITTED BY:
American Trucking Associations, Inc.
950 North Glebe Road, Suite 210
Arlington, VA 22203

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Primary Contact:
Ross Froat
ATA
Director of Engineering & Information Technology
rfroat@trucking.org

The American Trucking Associations, Inc. (ATA)[1] provides these comments in response to the December 6, 2018, Federal Communications Commission (FCC) public notice, *Office of Engineering and Technology and Wireless Telecommunications Bureau Seek Comment on 5GAA Petition for Waiver to Allow Deployment of Cellular Vehicle-To-Everything (C-V2X) Technology in the 5.9 GHz Band.* According to the notice, the 5GAA waiver petition claims that operating C-V2X in this band is consistent with the purpose and policy of allocating the 5.9 GHz band for short-range Intelligent Transportation System services. While ATA supports preserving the 5.9 GHz band for V2X communication, ATA has concerns about how the 5GAA waiver could affect incumbent Dedicated Short-range Communication (DSRC) operations. The waiver request calls for a major change to the use of the 5.9 GHz band which should properly be addressed by a petition, full comment period and rulemaking process. Given the significant concerns noted below and the need for a full process to properly address these matters, the FCC should reject this waiver request.

As the national representative of the trucking industry, ATA has a strong interest in highway safety for all road users, including pedestrians and cyclists. Highways are the motor carriers' and drivers' workplace. Employing more than 7.5 million people and moving 10.8 billion tons of freight annually trucking is the industry most responsible for moving America's economy. The trucking industry moves

[1] ATA is a united federation of motor carrier and allied members, state trucking associations, and national trucking conferences and councils created to promote and protect the interests of the trucking industry. Directly and through its affiliated organizations, ATA represents more than 40,000 industry stakeholders in the United States encompassing every type and class of motor carrier operation.

70.2 percent of our nation's domestic freight and is a critical player in the safety of our nation's roadways, spending approximately $10 billion per year on safety training, technology, equipment, and management.[2]

ATA has long sought to advance the deployment of wireless communication technologies as a means of improving road safety and promoting innovation in the trucking and transportation industries. As a strong advocate for road safety, ATA continues to be a leader in protecting the FCC 5.9 GHz band (5.850-5.925 GHz), including all seven of the allocated channels, from signal interference for vehicle-to-vehicle (V2V), vehicle-to-infrastructure (V2I) and related applications (collectively referred to as V2X).

In previous filings with the Commission[3], ATA has noted the rapid development of driver-assistive truck platooning[4] enabled by DSRC technology, the federal and state DSRC deployment programs identified in the U.S. Department of Transportation's *Preparing for the Future of Transportation: Automated Vehicles 3.0*[5] – which will result in the deployment of over 2,100 DSRC-enabled infrastructure devices by 2020 – and the announced plans of two passenger vehicle manufacturers that will greatly expand the number of DSRC-equipped vehicles on the roads in the next few years. ATA believes that, given the significant investments in DSRC technology by both the public and private sector, it is important for the FCC to ensure that the 5.9 GHz band remains free from harmful interference, and that any rule changes or waivers to allow other V2X communications technology to operate in this band do not disrupt the current deployments and innovations that are occurring under existing FCC rules. Additionally, in allowing other V2X communications technology to operate in the 5.9 GHz band, rules should be structured to support device interoperability, including backward compatibility, so that safety data can be exchanged among V2X-equipped vehicles, regardless of which V2X communications technology is on each vehicle. Further, the FCC should not grant the request for C-V2X exclusive use of any portion of the 5.9 GHz band; rather, DSRC use should continue to be allowed across all seven channels. Before implementing changes that would allow new V2X technologies to use the 5.9 GHz band, rigorous safety testing should be conducted to validate performance with respect to the communication of basic safety messages and the operation of other V2X applications, including real-world around-the-clock testing focused specifically on roadway safety.

ATA looks forward to widespread deployment of V2X communications throughout the transportation sector that will enable real-time communication among vehicles of all types, roadway infrastructure devices, and all road users to reduce crashes and improve traffic flow. When considering proposals to allow new V2X technologies to utilize the 5.9 GHz band, potential rule changes should ensure compatibility with V2X systems developed under existing FCC rules so that new technologies and

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[2] ATA, American Trucking Trends 2018.
[3] ATA letter to FCC, Subject: ET Docket No. 13-49, Revision of Part 15 of the Commission's Rules to Permit Unlicensed National Information Infrastructure (U-NII) Devices in the 5 GHz Band, August 22, 2018; and ATA Comments to FCC, RE: ET Docket No. 13-49, Phase I Testing of Prototype U-NII-4 Devices, November 28, 2018.
[4] Driver-assistive truck platooning uses V2V communication to connect the trucks' active safety systems – braking, acceleration, and, in some cases, steering – allowing trucks to travel closer together than would otherwise be possible, reducing aerodynamic drag and increasing fuel efficiency.
[5] Preparing for the Future of Transportation, Automated Vehicles 3.0 (p. 14), U.S. DOT, October 2018, https://www.transportation.gov/av.

innovations extend the benefits of deployed V2X systems rather than cause disruptions and delays to the widespread deployment of V2X systems. Co-existence (non-interference) and interoperability, including backward compatibility, are essential towards enabling a wide deployment of V2X communications that accommodates all vehicle types, road users, and infrastructure operators that will facilitate the safe and efficient movement of people and goods. ATA is encouraged by the work being done by the IEEE 802 LAN/MAN Standards Committee to produce a Next Generation V2X standard to provide a seamless evolution path for DSRC that will guarantee device interoperability, same-channel coexistence, and backward compatibility.[6] This will stimulate further near-term investments in DSRC by ensuring that those investments will be protected and enhanced in years to come. By avoiding band fragmentation this achieves evolution that is both spectrally efficient (no duplicated services) and cost efficient (no need to invest in multiple technologies).

Thank you again for the opportunity to submit these comments. If you have any questions, please contact Ross Froat at (703) 838-7980 or rfroat@trucking.org.

[6] See comments of IEEE 802 LAN/MAN Standards Committee submitted to this docket dated January 17 2019.